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FEB 23 2009 FCC Mail Room

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February 11, 2009

Marlene H. Dortch Office of the Secretary **Federal Communications Commission** 445 12th Street SW Washington DC 20554 RE: EB Docket No. 06-36,

**CPNI Certification for Calendar Year 2008** 

Dear Ms. Dortch:

Enclosed for filing please find an original and four copies of Annual 47 C.F.R. Sect 64.2009(e) CPNI Certification along with an original and four copies of the Accompanying Statement of Compliance Attachment for Crosslake Telephone Company d/b/a Crosslake Communications.

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Sincerely,

Debby Floerchinger Debby Floerchinger Office Manager

Enclosures

No. of Copies rec'd 0 44 List ABCDE

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification Received & Inspected

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### EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for 2008.

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Date filed: 01/26/2009

Name of company covered by this certification: Crosslake Telephone Company d/b/a Crosslake

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Communications

Form 499 Filer ID: 807783

Name of signatory: Paul Hoge

Title of signatory: General Manager

I, Paul Hoge, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules. See attached accompanying statement of operating procedures.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company currently has received no information with respect to the processes pretexters are using to attempt to access CPNI. At this time, we have not encountered known pretexting. Our protective measures against pretexters are outlined in the accompanying statement of operating procedures.

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Signed:

David Horio

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#### ATTACHMENT: Accompanying Statement of Compliance

Per the FCC CPNI rules [47 CFR §64.2009(e)] and as referenced in the attached signed certification, Crosslake Telephone Company d/b/a Crosslake Communications herein referenced as the Company hereby certifies that the Company is in compliance with the FCC CPNI rules and has outlined some of the important operating procedures below in order to ensure the Company's compliance in the protection of CPNI:

# Use of CPNI in Marketing

Our company does not use CPNI in any of its marketing efforts, and does not permit the use of, or access to, customer CPNI by our affiliates or any third parties. We use, disclose, or permit access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222(c)(1) and (d).

### **CPNI Safeguards**

Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.

Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, or in-office visit.

Our company disclosed call detail information (CDI) in a customer-initiated call only; after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

Our company discloses CPNI to a customer in person at our office location only when the customer presents a valid photo ID and the ID matches the name on the account.

Our company establishes passwords with customers in order to authenticate customer. Neither passwords nor the backup method for authentication rely on customers' readily available biographical information.

Our company notifies a customer immediately of changes in: a customer's password, a customer's response to back-up means of authentication, or address of record.

## CPNi Recordkeeping and Reporting

Our company maintains records of our compliance with the FCC's CPNI Rules for use of CPNI in outbound marketing efforts, for at least one year.

Our company is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

Our company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an international, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after seven business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.